

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF)	
GREATER ST. LOUIS AND VICINITY, et al.,)	
)	
Plaintiffs,)	Case No. 4:11CV75-CAS
)	
v.)	
)	
KRAFT & ASSOCIATES CO.,)	
)	
Defendant.)	

**MOTION FOR A CREDITOR'S BILL IN EQUITY
AND TO PIERCE THE CORPORATE VEIL**

Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and pursuant to the established procedures of the State of Missouri relating to proceedings in aid of execution, plaintiffs move the Court for equitable relief in the form of a creditor's bill, to allow plaintiffs to proceed to satisfy the judgment entered in this case against Kraft & Associates Co., which is not subject to execution by normal means available at law.

The plaintiffs further move the court to pierce the corporate veil of Kraft & Associates Co., and permit the plaintiffs to satisfy the judgment from the alter ego of Kraft & Associates Co., M.K. Contracting, LLC.

Plaintiffs have no adequate legal remedy. Further grounds supporting the use of a creditor's bill and piercing the corporate veil are set forth in the accompanying memorandum of law.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing electronically filed with the Court on August 16, 2011 and a copy was mailed to the following non-participant in e-filing: Kraft & Associates Co., 9738 Gravois Road, St. Louis, MO 63123; M.K. Contracting, LLC, 15 Larkin Lane, St. Louis MO 63128.

/s/ Michael A. Evans